

LAUREN M. BLAS, SBN 296823
lblas@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: 213.229.7000
Facsimile: 213.229.7520

GEOFFREY SIGLER (*pro hac vice*)
gsigler@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
Telephone: 202.955.8500
Facsimile: 202.467.0539

Attorneys for Defendants UNITED
BEHAVIORAL HEALTH and UNITED
HEALTHCARE INSURANCE COMPANY

MATTHEW M. LAVIN (*pro hac vice*)
Matt.Lavin@agg.com
AARON R. MODIANO (*pro hac vice*)
Aaron.Modiano@agg.com
ARNALL GOLDEN GREGORY LLP
1775 Pennsylvania Ave NW, Suite 1000
Washington, DC 20006
Telephone: 202.677.4030
Facsimile: 202.677.4031

DAVID M. LILIENSTEIN, SBN 218923
david@dllawgroup.com
KATIE J. SPIELMAN, SBN 252209
katie@dllawgroup.com
DL LAW GROUP
345 Franklin Street
San Francisco, CA 94102
Telephone: 415. 678.5050
Facsimile: 415.358.8484

Attorneys for PLAINTIFFS

[ADDITIONAL COUNSEL LISTED ON
SIGNATURE PAGE]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LD, DB, BW, RH and CJ, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

UNITED BEHAVIORAL HEALTH, a
California Corporation, UNITED
HEALTHCARE INSURANCE COMPANY, a
Connecticut Corporation, and MULTIPLAN,
INC., a New York corporation,

Defendants.

CASE NO. 4:20-cv-02254-YGR

**JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE PER L.R.
6-2**

Hon. Yvonne Gonzalez Rogers

Complaint filed: April 2, 2020
Third Amended Complaint filed: Sept. 10, 2021

1 Plaintiffs LD, DB, BW, RH and CJ, United Behavioral Health and UnitedHealth Insurance
 2 Company (“United Defendants”) and MultiPlan, Inc. (“MultiPlan”), collectively the “Parties,” to the
 3 above-entitled action, regarding the matters set forth herein, jointly submit this stipulation pursuant to
 4 Civil Local Rule 6-2. In further support of this Stipulation, the Parties state as follows:

5 **WHEREAS**, on June 23, 2023, this Court issued its Scheduling and Pretrial Order setting a
 6 case management conference for Monday, October 23, 2023 at 2:00 p.m. (Dkt. 319 at 1) via Zoom
 7 webinar and ordering the Parties to submit a joint case management conference statement seven days
 8 before the case management conference date (Dkt. 320 at 1);

9 **WHEREAS**, lead counsel for United Defendants has a pre-existing and immovable travel
 10 obligation and therefore cannot attend the case management conference currently scheduled for
 11 October 23, 2023;

12 **WHEREAS**, the Parties have met and conferred and neither MultiPlan nor Plaintiffs have any
 13 objection to continuing the case management conference to October 30, 2023 and continuing the
 14 deadline to submit the case management conference statement to October 23, 2023, or until such later
 15 time that is convenient for the Court;

16 **NOW, THEREFORE**, subject to the approval of the Court, and for good cause shown, the
 17 Parties hereby stipulate and agree as follows:

18 The case management conference currently scheduled for October 23, 2023 at 2:00 p.m. is
 19 continued to October 30, 2023 at 2:00 p.m. or until such later time that is convenient for the Court.
 20 The Parties’ deadline to submit their joint case management conference statement is continued to
 21 October 23, 2023, or seven days in advance of the new case management conference date, whichever
 22 is later.

23 **IT IS SO STIPULATED.**

24 //

25 //

26 //

27 //

28 //

1 DATED: July 11, 2023

GIBSON, DUNN & CRUTCHER LLP

2
3
4 By: /s/ Geoffrey Sigler

Geoffrey Sigler

5 Attorneys for Defendants UNITED BEHAVIORAL
6 HEALTH and UNITED HEALTHCARE INSURANCE
7 COMPANY

8 DATED: July 11, 2023

PHELPS DUNBAR LLP

9
10 By: /s/ Errol King

Errol King

11 Attorneys for Defendant MULTIPLAN, INC.

12 ERROL J. KING, JR. (*admitted pro hac vice*)

13 PHELPS DUNBAR LLP

14 II City Plaza, 400 Convention Street, Suite 1100

Baton Rouge, Louisiana 70802

15 Telephone: (225) 376-0207

Facsimile: (225) 381-9197

16 Errol.King@phelps.com

17 Dated: July 11, 2023

ARNALL GOLDEN GREGORY LLP

18
19 By: /s/ Matthew M. Lavin

Matthew M. Lavin

20
21 Dated: July 11, 2023

DL LAW GROUP

22
23 By: /s/ David Lilienstein

24 David Lilienstein

25 Attorneys for PLAINTIFFS
26
27
28

[PROPOSED] ORDER

Having considered the Parties' Joint Stipulation and [Proposed] Order, the Court HEREBY
ORDERS as follows:

The case management conference currently scheduled for October 23, 2023 at 2:00 p.m. is
continued until October 30, 2023 at 2:00 p.m. The Parties' deadline to submit their joint case
management conference statement is continued to October 23, 2023.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

The Hon. Yvonne Gonzalez Rogers
UNITED STATES DISTRICT COURT JUDGE

ATTESTATION PURSUANT TO LOCAL RULE 5-1

I, Geoffrey Sigler, am the ECF user whose identification and password are being used to file this document. Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that concurrence in the filing of this document has been obtained from the other signatories hereto.

Dated: July 11, 2023

/s/ Geoffrey Sigler

Geoffrey Sigler

106405186.2